

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA,** \*  
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\* **CRIMINAL NO. 1:22-336-SAG**  
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\*  
**ANNA GABRIELIAN and** \*  
**JAMIE LEE HENRY,** \*  
\*  
**Defendants.**

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**CONSENT MOTION TO MODIFY  
DEFENDANTS' CONDITIONS OF RELEASE**

On September 29, 2022, the Court ordered condition of release placing Dr. Gabrielian under home confinement, “restricted to 24-hour-a-day lock-down at [her] current residence except for medical necessities, attorney visits, court appearances, or other activities specifically approved by the court.” ECF 10. On May 9, 2023, the Court entered an order modifying conditions of release to allow Dr. Gabrielian to attend church services, exercise outside the home for 30 minutes, and take her child back and forth to school. ECF 88. On June 9, 2023, the Court modified Dr. Gabrielian’s conditions of release to remove her ankle monitor and allow her to leave her home under a 12-hour curfew, but ordered: “Dr. Gabrielian is still not permitted to travel within five miles of BWI, IAD, and DCA unless given permission by Pretrial Services (or when travelling to court appearances in Baltimore).” ECF 131 at 3. Her husband and co-Defendant, Dr. Jamie Lee Henry, is also subject to similar restrictions.

Defendants would like to take their children on trips to museums and other potential locations that are within five miles of airports. They ask to modify their conditions of release to reduce the restriction to “within one mile of BWI, IAD, and DCA unless given permission by Pretrial Services (or when travelling to court appearances in Baltimore).”

Defendants also request permission to travel for a beach vacation in North Carolina with their family to be scheduled within the time frame of August 15-30, with specific times and location to be approved by Pretrial Services and subject to any additional reporting requirements required by Pretrial Services.

Government Counsel and Pretrial Services have authorized counsel to represent that they consent to these requests.

Respectfully submitted,

SCHERTLER ONORATO MEAD & SEARS, LLP

*/s/ Christopher Mead*

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of August 2023, a true and correct copy of the foregoing was electronically filed and served on counsel for the United States through ECF.

/s/ Noah Cherry